

Exhibit N

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA,
CALIFORNIA, COLORADO,
CONNECTICUT, DELAWARE, DISTRICT
OF COLUMBIA, FLORIDA, GEORGIA,
HAWAII, ILLINOIS, INDIANA, IOWA,
LOUISIANA, MARYLAND,
MASSACHUSETTS, MICHIGAN,
MINNESOTA, MONTANA, NEVADA, NEW
JERSEY, NEW MEXICO, NEW YORK,
NORTH CAROLINA, OKLAHOMA,
RHODE ISLAND, TENNESSEE, TEXAS,
VIRGINIA, WISCONSIN

ex rel. Cathleen Forney
Plaintiffs

v. MEDTRONIC, INC.

Defendant.

Civil Action No. 15-cv-6264

JURY DEMAND

RELATOR'S RESPONSES TO DEFENDANTS' FIRST SET OF INTERROGATORIES

Relator Cathleen Forney hereby responds as follows to Defendants' First Set of Interrogatories:

Relator objects to the Instructions as imposing obligations beyond those set forth in the Federal Rules of Civil Procedure. Relator shall respond to the Interrogatories only to the extent required by the Rules.

INTERROGATORY NO. 1

Identify each Person with whom You or anyone acting on Your behalf has had one or more Communications regarding the Pending Qui Tam Litigation or the conduct alleged in Your Complaint. For each Person identified, provide the following information:

- (a) the date on which each Communication took place;
- (b) the Persons present or included in the Communication; and
- (c) the substance of the Communication.

RESPONSE TO INTERROGATORY NO. 1.

Relator objects on the grounds that this Interrogatory seeks information covered by the attorney-client communication and attorney work product privileges. Relator also objects on the grounds that there are less burdensome means to obtain the information sought.

INTERROGATORY NO. 2

Identify all Persons whose testimony You expect to use for any purpose prior to trial in the Pending Qui Tam Litigation.

RESPONSE TO INTERROGATORY NO. 2

Relator objects on the grounds that this Interrogatory is vague and overbroad. Relator will identify persons whose testimony will be used at trial in accordance with deadlines set by the Federal Rules of Civil Procedure and the Court Orders of same. Relator also objects on the grounds that she cannot predict what motions the Defendant will file prior to trial in this matter, and thus cannot answer accurately and identify all persons whose testimony may be used to oppose a motion filed by Defendant. Relator also objects on the grounds that the Interrogatory calls for information covered by the attorney-client and attorney work product privileges. Without waiving any objections, and expressly reserving the right to supplement this response, Relator intends to use testimony from the following persons who may be contacted only through undersigned counsel: Cathleen Forney, Dr. Chris Taylor, Doug Willwerth, and Beth Coyle. Relator also intends to use testimony from the following persons: Liz Flynn, Adam Hafez, Christina Rich, David Roberts, Michael Mathias, Brian Haworth, Jeffrey M. Rothfeld, Neal

Horne, Clayton DeSantis, and John Burns. Relator likely will use testimony obtained through the conduct of the additional depositions convened in this matter, including, but not limited to, the testimony of Thomas Schumacher, J.J. Kuhn, and the regional vice presidents.

INTERROGATORY NO. 3

Identify every time that You provided, offered to provide, agreed to provide, directed others to provide, or assisted with providing a service to a Healthcare Provider believing that your conduct was illegal and in violation of the law.

RESPONSE TO INTERROGATORY NO. 3

Relator objects on the grounds that this Interrogatory that it is vague and ambiguous, seeks information already in Defendant's possession but not yet produced to Relator, and that there are less burdensome means to obtain the information. Answering further, Relator cannot answer this Interrogatory until Defendant produces the daily calendars that are required to be produced by Court Order.

INTERROGATORY NO. 4

Identify every time a Medtronic employee communicated to you in words or substance while you were an employee of Medtronic that they believed that they were violating the law when they provided service to Healthcare Providers, as alleged in Your Complaint.

RESPONSE TO INTERROGATORY NO. 4

Relator objects on the grounds that this Interrogatory is vague and ambiguous, seeks information already in Defendant's possession, and that there are less burdensome means to obtain the information sought. Answering further, Relator cannot answer this Interrogatory unless and until Defendant produces all of the emails and other documents maintained by Relator during the course of her employment with Defendant.

INTERROGATORY NO. 5

Identify every alleged or perceived violation by Medtronic of Medtronic's Code of Conduct, Medtronic's Business Conduct Standards, or any applicable legal or regulatory requirements that you reported to Medtronic on or before the date you executed the Separation Agreement and Release with Medtronic.

RESPONSE TO INTERROGATORY NO. 5

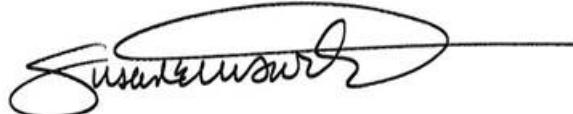
Relator objects on the grounds that this Interrogatory that it is vague and ambiguous, assumes a fact not in evidence on the record (namely, that Relator executed a Separation Agreement and Release with Medtronic), and seeks information that there are less burdensome means to obtain the information sought. Answering further, Relator cannot answer this Interrogatory unless and until Defendant produces all of the emails and other documents maintained by Relator during the course of her employment with Defendant.

Respectfully submitted by:

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CERTIFICATE OF SERVICE

Pursuant to the parties' agreement, Relator's Responses to Medtronic's First Set of Interrogatories was conveyed via email to counsel for Medtronic on October 20, 2017.

/s/Susan L. Burke
Susan L. Burke